SKILLSIGNAL™
Construction Safety & Compliance

TOOLBOX TALK

Outside Contractors and Lockout: Two Companies, One Machine, and the Assumption That Kills

TOPIC NO.	DURATION	AUDIENCE
LO-10	10 to 15 min	All Crew

OSHA REFERENCE 29 CFR 1910.147(f)(2) · 29 CFR 1910.147(f)(3) · 29 CFR 1926.16

PROJECT / JOBSITE	DATE	PRESENTED BY

01 THE HOOK

START HERE

The plant mechanic locks out the air line to a pressure vessel so the inspection contractor can open it. The contractor shows up, sees the lock on the valve, hangs his own lock next to it, and starts pulling bolts on the access cover. He assumed the plant mechanic bled the vessel. The plant mechanic assumed the contractor would. The cover comes off at 90 psi and puts the contractor in the hospital. Two trained men. Two good locks. Two written procedures that never met. On a construction site, every day is this scenario: the GC, five subs, the owner's facility crew, and a rental company tech, all with their own lockout programs, all working on the same equipment. The standard has one paragraph for this.

02 WHAT THE STANDARD REQUIRES

29 CFR 1910.147(f)(2)(i): whenever outside servicing personnel are engaged in lockout activities, **"the on-site employer and the outside employer shall inform each other of their respective lockout or tagout procedures."** **(f)(2)(ii)**: the on-site employer **shall ensure that his/her employees understand and comply with the restrictions and prohibitions** of the outside employer's program.

Both directions. The host tells the contractor. The contractor tells the host. And the host makes sure its own people follow the contractor's rules when they are working together.

In construction, **29 CFR 1926.16** puts the prime contractor on the hook for compliance by all subcontractors on the project, and the multi-employer policy means the controlling employer, the creating employer, and the exposing employer can all be cited for the same hazard. A sub's lockout failure on a GC's site is the GC's citation too.

03 WHAT "INFORM EACH OTHER" ACTUALLY LOOKS LIKE

STEP 1

EXCHANGE THE WRITTEN PROCEDURES BEFORE THE WORK

Before the contractor touches the equipment, both sides sit down with both programs: the machine-specific procedure, the lock and tag standards, the group lockout method, the lock removal procedure, the shift change rule. Ten minutes at the pre-task meeting. Attach it to the JHA or the permit.

STEP 2

DECIDE WHO DOES WHAT, IN WRITING

Who isolates each energy source. **Who releases the stored energy.** Who verifies zero. Who is the primary authorized employee for the group lockout. The vessel in the hook got opened at 90 psi because that one line was never written down.

STEP 3

ONE LOCK PER PERSON FROM BOTH COMPANIES

The contractor's crew and the host's crew each put personal locks on the hasp or group lock box under **(f)(3)**. A contractor is never "covered" by the host's lock, and the host crew is never covered by the contractor's. Different color locks for different employers is a common and good practice.

STEP 4

AGREE ON THE RESTART

Who announces it, who walks the area, who confirms every lock from both companies is off, and who returns the equipment to the operator. If the contractor leaves at the end of the day with the job unfinished, whose lock stays on overnight, and who briefs the next shift.

STEP
5

SPEAK UP WHEN THE PROGRAMS DISAGREE

The host locks at the panel; the contractor locks at the local disconnect too. The host uses tags on old valves; the contractor requires locks everywhere. When the two programs differ, **the stricter rule wins**, and the supervisor or safety lead settles it before anyone goes in.

04 THE ASSUMPTIONS THAT GET PEOPLE HURT

THE ASSUMPTION	THE QUESTION TO ASK INSTEAD
STORED ENERGY “They bled the line before we got here.”	STORED ENERGY **“Show me the gauge at zero. Who bled it, and when?”**
ISOLATION “There is a lock on it, so it is isolated.”	ISOLATION **“Which energy sources does that lock cover? Where are the other ones?”**
VERIFICATION “Their guy tested it this morning.”	VERIFICATION **“I am going to test it again before I go in. Where is the test point?”**
RESTART “The contractor is done, they must have cleared everyone.”	RESTART **“Are all of their locks off and all of ours? Walk it with me.”**
AUTHORITY “The host said it was fine to go ahead.”	AUTHORITY **“Fine under whose procedure? Let me see it.”**

⚠ **A LOCK FROM A COMPANY YOU DID NOT TALK TO IS A LOCK YOU KNOW NOTHING ABOUT**

When you find a lock on equipment from a contractor or a host crew and nobody has briefed you on their procedure, you do not know what it isolates, whether stored energy was released, or when it is coming off. Do not add your lock and assume. Find their primary authorized employee, get the procedure, and start the exchange that (f)(2) requires. If they are gone, treat the equipment as unknown and locked for a reason.

05 WHY IT MATTERS

[JOBSITE]

FOR THE CREW

On a multi-employer site the GC owns every sub's lockout failure. A standing pre-task exchange of procedures, written into the permit or JHA, is the cheapest way to satisfy (f)(2) and the multi-employer policy at the same time.

[INDIVIDUAL]

FOR YOU

When two crews share a machine, you are trusting people you have never worked with to have done the steps you cannot see. The only cure is asking to see them. Show me the gauge. Show me the test. Show me the procedure.

[HOME]

FOR LIFE OFF-SITE

Any time a service tech works on equipment in your house while you are also working on it: the furnace, the well pump, the panel. Ask what they shut off and tell them what you shut off. Same exchange.

06 TODAY'S DRILL

TODAY'S DRILL **RUN THE EXCHANGE**

The next time a contractor, a sub, or the owner's crew will lock out equipment your crew also works on, hold a five-minute exchange before anyone touches it: both procedures on the table, who isolates what, who releases stored energy, who is primary, how restart happens. Write it on the JHA and have both leads sign it. If you are the contractor on someone else's site, you ask for the meeting. Do not wait to be offered one.

07 CREW DISCUSSION

Take 2 minutes. Pick one.

1. What equipment on this site is worked on by more than one company? Who has seen the other company's lockout procedure?

2. Has anyone ever added their lock to a hasp that already had a stranger's lock on it, without knowing what it covered?

3. When the rental company tech services the lift or the pump, whose lockout procedure is used?

08 ATTENDANCE & SIGN-OFF

All attendees confirm they participated in this Toolbox Talk and understand the content covered.

NAME (PRINT)	SIGNATURE

SUPERVISOR SIGNATURE

_____ Date: _____

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